

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WESTERN DIVISION

C.A. No. 04CV30241-MAP

MICHAEL F. ERAI,

Plaintiff,

v.

TOWN OF ORANGE,

Defendant

JOINT MOTION TO CONTINUE
HEARING ON DEFENDANT'S
MOTION FOR SUMMARY
JUDGMENT

Now come the parties in the above-captioned matter and respectfully request this Honorable Court to continue the hearing on the Defendant, Town of Orange's Motion for Summary Judgment, currently scheduled for April 3, 2006 at 3 p.m.

As grounds therefor, counsel for the plaintiff will be out of the country on April 3, 2006 and will not be available for the hearing. Counsel for the defendant does not object to continuing this hearing to a later date. The parties propose that the Court reschedule this hearing to April 20, April 25, April 27, April 28, or any date that is convenient for the Court.

WHEREFORE, the parties respectfully request that this Court grant this Joint Motion to Continue the Hearing on Defendant's Motion for Summary Judgment.

<p>PLAINTIFF,</p> <p>MICHAEL F. ERALI,</p> <p>By his attorney,</p> <p><u>/s/ Suzanne Garrow</u></p> <p>Suzanne Garrow, Esq. (BBO# 636548) Heisler, Feldman & McCormick, P.C. 1145 Main Street, Suite 508 Springfield, MA 01103 (413) 788-7988</p>	<p>DEFENDANT,</p> <p>TOWN OF ORANGE,</p> <p>By its attorneys,</p> <p><u>/s/Carolyn M. Murray</u></p> <p>David C. Jenkins (BBO# 251000) Carolyn M. Murray (BBO# 653873) Kopelman and Paige, P.C. 101 Arch Street, 12th Floor Boston, MA 02110 (617) 556-0007</p>
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CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF).

Dated: March 17, 2006

/s/ Carolyn M. Murray
Carolyn M. Murray